

Ms. Rebecca M. Horton  
Agent for Marketquest, Inc.  
118 ½ E. Main Street, Ste. 1  
Salem, VA 24153-3805

JAN 18 2006

Dear Ms. Horton:

Subject: Amendment- add additional pests  
MarketQuest One Drop Flea & Tick Control  
EPA Registration Number 73510-5  
Your submissions dated August 2, 2005

The amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.
2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:
  - a) Submit or cite data conforming the duration of effectiveness of the products against *Dermacentor variabilis* within 12 months for general tick claims.
  - b) Claims against mosquitoes are not acceptable on the basis of the data provided in MRID 46425801.
  - c) As per previous reviews of similar products (i.e., 2 March 2004 and 1 September 2004), remove the "< 15 lb" and "15 - 33 lb" weight classes from the label. Replace with "< 33 lbs" weight class. State the application rate for dogs weighing less than 33 lbs as 1.5 mL.
  - d) Flea, Tick & Mosquito treatment. "Conditionally Acceptable. This claim was inadvertently accepted in the previous review. Include a time qualification for mosquitoes or remove them from the label, as "monthly application" and "monthly treatment" imply month long protections. Submit or cite confirmatory data within 12 months.
  - e) Kills and repels ticks American Dog Ticks (*Dermacentor variabilis*) up to 3 to 4 weeks! "Remove. Submit or cite data in support of American Dog Ticks. As stated under the general recommendations, confirmatory data must be submitted within 12 months as a condition of general tick claims. At that time, the species specific claims may be re-evaluated at the request of the registrant.

f) Triple Protection against Fleas, Ticks, Mosquitoes" Remove or Revise (Conditionally Acceptable). The consumer is likely to understand this to mean that three active ingredients are present. Alternatively, remove the word "triple" resulting in the statement "Protection against: Fleas, Ticks, Mosquitoes." Include a time qualification for mosquitoes or remove them from the label, as "monthly application" and "monthly treatment" imply month long protection. Submit or cite confirmatory data within 12 months.

g) Flea, Tick & Mosquito treatment." Conditionally Acceptable. Include a time qualification for mosquitoes or remove them from the label, as "monthly application" and "monthly treatment" imply month long protection. Submit or cite confirmatory data within 12 months.

h) Kills mosquitoes that may vector heartworm. Remove. Submit or cite data for a primary vector of canine heartworm (i.e., Aedes sp. preferred).

i) Kills, Repels, and Prevents reinfestation of ticks, including Brown Dog Ticks and Ixodes spp. which may be [are known to be] vectors of Lyme Disease, for up to 6 weeks." Remove "[are known to be]". "Modify to read "for up to 5 weeks". Data for Ixodes ricinus support only a 5 week claim.

j) Protects against blood feeding mosquitoes that may vector heartworm. "Remove. Submit or cite data for a primary vector of canine heartworm (e.g., Aedes sp. preferred)

k) Kills mosquitoes on dogs for up to 4 weeks." Remove.

l) MarketQuest One Drop Flea & Tick Control with IGR kills and repels ticks for up to 6 weeks, and kills mosquitoes on dogs." Modify to read "for up to 5 weeks". Data for Ixodes ricinus support only a 5 week claim.

3. Submit three (3) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

Enclosed is a copy of the Efficacy Review dated January 18, 2005.

Sincerely,

George T. LaRocca  
Product Manager 13  
Insecticide Branch  
Registration Division (7505C)

Enclosure

4/9

[FRONT PANEL]

# MarketQuest One Drop Flea & Tick Control with IGR\* \*Insect Growth Regulator



DO NOT USE ON CATS

FOR DOGS [33 lbs and Under] [Between 33 & 66 lbs][66 lbs & Over]

### Optional Marketing Statements

- CITRUS SCENT
- FLEA AND TICK CONTROL FOR DOGS AND PUPPIES 3 MONTHS [12 WEEKS] OF AGE & OLDER
- BREAKS FLEA LIFE CYCLE!
- KILLS AND REPELS [ADULT] FLEAS UP TO 5 WEEKS [PER APPLICATION]!
- KILLS, REPELS AND PREVENTS RE-INFESTATION OF FLEAS FOR UP TO 5 WEEKS!
- KILLS AND REPELS TICKS FOR UP TO 6 WEEKS [PER APPLICATION]!
- KILLS AND REPELS BROWN DOG TICKS (*Rhipicephalus sanguineus*) FOR UP TO 6 WEEKS [PER APPLICATION]!
- KILLS AND REPELS AMERICAN DOG TICKS (*Dermacentor variabilis*) FOR UP TO 3 TO 4 WEEKS [PER APPLICATION]!
- MONTHLY APPLICATION
- MONTHLY FLEA AND TICK TREATMENT!
- KILLS AND REPELS FLEAS AND TICKS FOR UP TO 5 WEEKS [PER APPLICATION]!
- KILLS AND REPELS ADULT FLEAS FOR UP TO 5 WEEKS [PER APPLICATION]!
- 3 [4] [5] [6] [9] [12] MONTH SUPPLY [APPLICATIONS]
- STOPS FLEA EGGS FROM HATCHING!
- CONTROLS REINFESTATION!
- CONTAINS BITREX
- TRIPLE PROTECTION AGAINST  
FLEAS  
TICKS  
MOSQUITOES
- FLEA, TICK & MOSQUITO TREATMENT
- KILLS MOSQUITOES THAT MAY VECTOR HEARTWORM
- KILLS, REPELS AND PREVENTS REINFESTATION OF TICKS, INCLUDING BROWN DOG TICKS AND *IXODES SPP.* WHICH MAY BE [ARE KNOWN TO BE] VECTORS OF LYME DISEASE. FOR UP TO 6 WEEKS.
- PROTECTS AGAINST BLOOD FEEDING MOSQUITOES THAT MAY VECTOR HEARTWORM.
- KILLS MOSQUITOES ON DOGS FOR UP TO 4 WEEKS.
- KILLS FLEA EGGS & LARVAE
- PREVENTS FLEA EGGS FROM DEVELOPING INTO BITING ADULTS

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

JAN 18 2006

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
7-3510-5

[Use of the following marketing claims as applicable to the specific size packaging]

- For Dogs Between 15 [33] and 33 [66] LBS.
- For Dogs Weighing 15 LBS. and under [or less]; For Dogs Weighing Less Than 15 LBS.
- For Dogs Weighing 66 LBS. and over [or more]; For Dogs Weighing More Than 66 LBS.

**Keep Out of Reach of Children**

## CAUTION

See back/side/other panel(s) for additional Precautionary Statements.

NET CONTENTS: xx [1.5 ml (.05 fl. oz.)][3.0 ml (.1 fl. oz.)] [6.0 ml (0.2 fl. oz.)] Applicator  
[CONTENTS: xx x.x mL Applicators (Total x.xx fl. oz.)]

[BACK/SIDE/OTHER PANEL(S)]

**ACTIVE INGREDIENTS**

Permethrin\* (CAS #52645-53-1)..... 45.0%  
S-Methoprene (CAS #65733-16-6)..... 1.2%

**OTHER INGREDIENTS**..... 53.8%

**TOTAL**..... 100.0%

\*Cis/trans ratio: Max 55% (±) cis and min 45% (±) trans

**READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS 3 MONTHS [12 WEEKS] OF AGE & OLDER.**

**DO NOT USE ON CATS.**

**PRECAUTIONARY STATEMENTS**

**Hazards to Domestic Animals**

**CAUTION**

FOR EXTERNAL USE ON DOGS ONLY. Do not use on puppies under 3 months of age. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant, or nursing dogs. **DO NOT USE ON CATS** or animals other than dogs. Cats that actively groom or engage in close physical contact with treated dogs may be at risk of serious harmful effect. Sensitivities may occur after use with ANY pesticide product for pets. If signs of sensitivity occur, bathe your dog with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. Signs of sensitivity to this product include skin sensitivity, increased itchiness, redness, rash, hair discoloration or hair loss at the application site. Dogs may also show "lethargy".

**Environmental Hazards:** This product is extremely toxic to fish and aquatic organisms. Do not apply directly to any body of water. Treated dogs should not be allowed to go swimming for 12 hours following treatment.

**PHYSICAL OR CHEMICAL HAZARDS:** Combustible! Do not use or store near heat or open flame.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**DO NOT USE ON CATS** or animals other than dogs. **May be toxic and potentially fatal if applied to or ingested by cats.**

Do not get this product in your dog's eyes or mouth. Repeat applications may be made if necessary, but do not apply more often than once every 4 weeks.

[For Dogs Weighing 33 lbs and Under: (1.5 ml applicator tubes) Apply one tube (1.5ml) of this product as a spot or stripe to the dog's back between the shoulder blades.]

[For Dogs Weighing Between 33 and 66 lbs: (1.5 ml applicator tubes) Apply one tube (1.5 ml) of this product as a spot or stripe to the dog's back between the shoulder blades and apply a second tube (1.5 ml) as a spot or stripe to the dog's back directly in front of the base of the tail.]

**OR**

[(3.0 ml applicator tubes) Apply approximately half of the tube (1.5 ml) of this product as a spot or stripe to the dog's back between the shoulder blades and apply the rest of the tube's contents (1.5 ml) as a spot or stripe to the dog's back directly in front of the base of the tail.]

**OR**

[Apply the entire tube (3.0 ml) as a continuous stripe on the dog's back starting between the shoulder blades and ending directly in front of the base of the tail.]

6/9

[For Dogs Weighing 66 lbs and Over: (1.5 ml applicator tubes) Apply one tube (1.5 ml) of this product as a stripe to the dog's back between the shoulder blades and apply a second and a third tube (two 1.5 ml tubes) continuing the stripe down the center of the dog's back and apply a fourth tube (1.5 ml) to the dog's back directly in front of the base of the tail.]

OR

[(6.0 ml applicator tubes) Apply approximately half of the tube (3.0 ml) of this product as a spot or stripe to the dog's back between the shoulder blades and apply the rest of the tube's contents (3.0 ml) as a spot or stripe to the dog's back directly in front of the base of the tail.]

OR

[Apply the entire tube (6.0 ml) as a continuous stripe on the dog's back starting between the shoulder blades and ending directly in front of the base of the tail.]

**HOW TO APPLY:**

[FOR SARAN TUBES IN BLISTER CARD: Remove product tube from package: Holding tube with notched end pointing up and away from face and body, snap or cut off narrow end at notches. Invert tube over dog and use open end to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin. Wrap tube and put in trash.]

OR

[FOR FLAT CARD (doubled) UNIT-DOSE PACKAGING: Separate cards along the perforated line. Holding separated card by its wide end with narrow end pointing up and away from face and body, cut along dotted line. Invert card over dog and use narrow end of the card to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin. Wrap card and put in trash.]

OR

[FOR FLAT CARD UNIT DOSE PACKAGING: (For push pin type applicator) Remove one product tube from card. With cap end pointed up and away from face and body, depress cap to pierce tube end. Carefully remove cap, invert tube over dog, and with tube in close to dog's skin, squeeze tube to apply product. Wrap empty tube and put in trash.]

OR

[FOR FOLDING CARD OR TABBED CARD UNIT-DOSE PACKAGING: Remove product tab by tearing along perforation. Holding tab with tube end pointed up and away from face and body, cut along dotted line. Invert tab over dog and use narrow end of card to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin.]

OR

[FOR BLISTER CARD WITH TRI-LAYER TUBES: Remove product tube(s) from package. Fold along perforation between tubes and tear off one (or more) tube(s). [Return unused tubes to package.] Holding tube with notched end pointing up and away from face and body, snap off (or cut) narrow end at notches. Invert tube over dog and use open end to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin.]

[\*\* FOR MULTI-DOSE PACKAGING: Withdraw (1.5 ml)(3.0 ml)(6.0 ml) of solution at a time. Apply entire given dose directly to the skin at the indicated locations.]

[\*\* FOR DROPPER BOTTLE MULTI-DOSE PACKAGING: Insert dropper tube into insecticide solution, squeeze bulb and then release to fill tube barrel to (1.5ml)(3.0 ml)(6.0 ml) line. Position dropper tube end in dog's hair next to skin and squeeze bulb to apply all of the solution to the dog's skin as indicated for dog's size.]

[\*\* FOR SALE TO VETERINARIANS ONLY]

**STORAGE AND DISPOSAL**

**Storage:** Store in a cool, dry place. Protect from freezing.

**Disposal:** *If empty:* Do not reuse this container. Place in trash or offer for recycling if available.

719

*If partly filled:* Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

MarketQuest One Drop Flea & Tick Control with IGR is an effective and easy to use product. This product has demonstrated greater than 92% control of fleas within one day of application. It prevents eggs from fleas on treated dogs from developing into biting adults, and prevents reinfestations for up to 5 weeks. MarketQuest One Drop Flea & Tick Control with IGR kills and repels ticks for up to 6 weeks, and kills mosquitoes on dogs. As with all flea and tick control products, MarketQuest One Drop Flea & Tick Control with IGR should be used as part of a program aimed at reducing flea populations in the dog's environment (bedding, carpets, kennel, yard). Consult your veterinarian, entomologist, or retailer for program recommendations.

**NOTICE OF WARRANTY**

MARKETQUEST, INC. MAKES NO WARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PARTICULAR PURPOSE, OR OTHERWISE, EXPRESSED OR IMPLIED, CONCERNING THIS PRODUCT OR ITS USES WHICH EXTEND BEYOND THE USE OF THE PRODUCT UNDER NORMAL CONDITIONS IN ACCORDANCE WITH THE STATEMENTS MADE ON THIS LABEL.

**MarketQuest, Inc.**

746 Walker Road, Suite 10-301  
Great Falls, VA 22066

879

**TUBE LABEL** (folding card and flat card packaging designs)

**MARKETQUEST ONE DROP FLEA & TICK CONTROL WITH IGR**

PERMETHRIN 45.0% W/W  
S-METHOPRENE 1.2% W/W



**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
READ DIRECTIONS AND  
PRECAUTIONS BEFORE USING

EPA Reg. No. 73510-5



9/9

TAB LABEL (folding card and tabbed card packaging designs)

**MARKETQUEST ONE DROP FLEA & TICK CONTROL WITH IGR**



**ACTIVE INGREDIENTS**

Permethrin (CAS #52645-53-1).....45.0%  
S-Methoprene (CAS #65733-16-6)..... 1.2%

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
SEE MAIN LABEL FOR ADDITIONAL  
PRECAUTIONS AND INSTRUCTIONS FOR USE

EPA Reg. No. 73510-5

**OUTER BOX LABEL** (Contains the following labeling plus full product label)

**MARKETQUEST ONE DROP FLEA & TICK CONTROL WITH IGR\***

\*Insect Growth Regulator (S-methoprene) inhibits development of the immature stages of the fleas preventing them from reaching the biting adult stage.

(picture of flea life cycle here)

**4 STEPS FOR COMPLETE FLEA CONTROL**

- Step 1- Shampoo or dip your dog.
- Step 2- Treat indoor and outdoor premise with indoor and outdoor sprays, foggers and powders labeled for flea control.
- Step 3- Apply MarketQuest One Drop Flea & Tick Control with IGR for flea, tick and mosquito control.
- Step 4- Maintenance treatments with on-animal sprays and powders.